

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

**BASE ACCESS, JEDD COWSER,
LISA DEMUSIS, CATHERINE
HANSEN, RYAN KEMPF, CHARLEY
KURLINKUS, and MARSHALL
MILLER,**

Plaintiffs,

v.

Case No. 4:25-cv-790

**NATIONAL PARK SERVICE;
JESSICA BOWRON**, Acting Director of
the National Park Service, in her official
capacity; **DEPARTMENT OF THE
INTERIOR; DOUG BURGUM**, Secretary
of the Department of the Interior, in his
official capacity; **PAM BONDI**, Attorney
General, in her official capacity,

Defendants.

**JOINT MOTION TO ENTER A BRIEFING SCHEDULE FOR 12(b)(1) AND
12(b)(6) MOTION(S) AND TO RESET THE INITIAL PRETRIAL
CONFERENCE**

On March 7, 2025, the Court entered the Order for Conference and Disclosure of Interested Parties, which, among other things, established a May 7th deadline for filing the Joint Discovery/Case Management Plan and set the initial pretrial conference for May 21, 2025, at 2:30 p.m. *See* ECF No. 5. A week later, the Court entered the scheduling and docket control order. *See* ECF No. 6. The parties met and conferred on April 30th to prepare the Joint Discovery/Case Management Plan. During that meet-and-confer and in conjunction with the Parties' discussion about scheduling, Defendants noted they will

likely file a motion to dismiss. Because of the counsels' respective work obligations (which include preparing and filing multiple dispositive motions in earlier-filed cases) and several long-arranged trips, the parties jointly formulated a schedule to brief any motion to dismiss that Defendants may file.

The parties respectfully request that the Court vacate its earlier orders, ECF Nos. 5 and 6, and enter an order adopting the parties' proposed briefing schedule, as set forth below:¹

- Defendants must file a responsive pleading, including any 12(b)(1) or 12(b)(6) motions by **June 12, 2025**;
- Plaintiffs must file a response to any motion to dismiss by **July 3, 2025**;
- Defendants must file any reply by **July 17, 2025**.

For the sake of efficiency, the parties also propose combining oral argument on any motion to dismiss with the initial pretrial conference and suggest a hearing/conference date of **July 30, 2025**.

Dated: May 2, 2025

Respectfully submitted,

/s/ Casey Norman
Casey Norman
Litigation Counsel
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¹ The parties have separately filed a proposed scheduling order for the remaining deadlines in this case as an exhibit to the Joint Discovery/Case Management Plan, and respectfully request that the Court enter that new scheduling order.

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